

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

Lordstown Motors Corp, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

**NOTICE OF *SECOND AMENDED*<sup>2</sup> AGENDA OF MATTERS SCHEDULED FOR  
HEARING ON OCTOBER 31, 2023 AT 10:30 A.M. (ET)**

**THE REMOTE HEARING WILL BE CONDUCTED ENTIRELY BY ZOOM AND  
REQUIRES ALL PARTICIPANTS TO REGISTER IN ADVANCE. COURTCALL  
WILL NOT BE USED TO DIAL IN. PLEASE USE THE FOLLOWING LINK TO  
REGISTER FOR THE HEARING:**

<https://debuscourts.zoomgov.com/meeting/register/vJlsfu6qqD8oE4C7JiuPUTjObKepHCPILl8>

**ONCE REGISTERED, PARTIES WILL RECEIVE A CONFIRMATION EMAIL  
CONTAINING PERSONAL LOG-IN INFORMATION FOR THE HEARING.**

**I. MATTERS GOING FORWARD:**

1. Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notice, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief [[Docket No. 467](#) – filed September 22, 2023]

Response/Objection Deadline: October 6, 2023 at 4:00 p.m. (ET); extended until October 27, 2023 at 4:00 p.m. (ET) for the Official Committee of Unsecured Creditors

Responses/Objections Received:

A. Objection by the U.S. Securities and Exchange Commission to Debtors'

---

<sup>1</sup> The Debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101). The Debtors' service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

<sup>2</sup> Amended items appear in bold.

Motion to Approve Disclosure Statement, Plan and Solicitation Procedures, Forms and Ballots and Other Relief, and Reservation of Rights [[Docket No. 522](#) – filed October 6, 2023]

- B. Lead Plaintiff's Objection to the Debtors' Disclosure Statement and Disclosure Statement Motion [[Docket No. 525](#) – filed October 6, 2023]
- C. Delaware Class Plaintiffs' Objection to Debtors' Motion for Entry of an Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation Approving Plan Solicitation and Voting Procedures, (III) Approving Forms of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notice, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief [[Docket No. 526](#) – filed October 6, 2023]
- D. Objection of Foxconn Parties to Debtors' Disclosure Statement with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 528](#) – filed October 6, 2023]
- E. Objection of Ride Investor Group to Approval of the Debtors' Disclosure Statement [[Docket No. 529](#) – filed October 6, 2023]
- F. Objection of the United States Trustee to Approval of Disclosure Statement and Solicitation Procedures [[Docket No. 537](#) – filed October 10, 2023]
- G. Supplemental Objection of Ride Investor Group to Approval of the Debtors' Disclosure Statement [[Docket No. 630](#) – filed October 30, 2023]

Related Documents:

- i. Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 360](#) – filed September 1, 2023]
- ii. Disclosure Statement Pursuant to 11 U.S.C. Section 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 361](#) – filed September 1, 2023]
- iii. Notice of Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 362](#) – filed September 1, 2023]
- iv. Notice of Rescheduled Hearing to Consider Approval of Disclosure Statement for the Joint Chapter 11 Plan of Lordstown Motors Corp. and its Debtor Affiliates [[Docket No. 539](#) – filed October 11, 2023]

- v. First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 605](#) – filed October 24, 2023]
- vi. Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 606](#) – filed October 24, 2023]
- vii. Notice of Filing of Blackline of (A) Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors and (B) Amended Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 607](#) – filed October 24, 2023]
- viii. Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors [[Docket No. 624](#) – filed October 29, 2023]
- ix. Disclosure Statement Pursuant to 11 U.S.C. § 1125 With Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors [[Docket No. 625](#) – filed October 29, 2023]
- x. Notice of Filing of Blackline of (A) Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors; and (B) Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors [[Docket No. 626](#) – filed October 29, 2023]
- xi. Debtors' Omnibus Reply in Support of Request for Approval of Disclosure Statement Motion [[Docket No. 627](#) – filed October 30, 2023]
- xii. Notice of Filing of Revised Proposed Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms Of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief [[Docket No. 628](#) – filed October 30, 2023]
- xiii. Order Pursuant to Local Rule 9006-1(d) Granting Debtors' Motion for Leave to File Late Reply of the Debtors' Omnibus Reply in Support of Request for Approval of Disclosure Statement [[Docket No. 632](#) – entered October 30, 2023]
- xiv. **Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors** [[Docket No. 635](#) – filed October 30, 2023]

- xv. **Disclosure Statement Pursuant to 11 U.S.C. § 1125 With Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and its Affiliated Debtors** [[Docket No. 637](#) – filed October 30, 2023]
- xvi. **Notice of Filing of Blackline of (A) Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors; and (B) Disclosure Statement Pursuant to 11 U.S.C. § 1125 with Respect to Modified First Amended Joint Chapter 11 Plan of Lordstown Motors Corp. and Its Affiliated Debtors** [[Docket No. 638](#) – filed October 30, 2023]
- xvii. **Notice of Filing of Revised Ballots to the Revised Proposed Order (I) Approving the Disclosure Statement and the Form and Manner of Notice, (II) Approving Plan Solicitation and Voting Procedures, (III) Approving Forms Of Ballots, (IV) Approving Form, Manner, and Scope of Confirmation Notices, (V) Establishing Certain Deadlines in Connection with Approval of the Disclosure Statement and Confirmation of the Plan, and (VI) Granting Related Relief** [[Docket No. 639](#) – filed October 30, 2023]

**Status:** The objections of the U.S. Securities and Exchange Commission, the Delaware Class Plaintiffs, the U.S. Trustee, the Ohio Lead Plaintiff and Foxconn are resolved by changes to the Modified Amended Plan and Modified Amended Disclosure Statement. The Debtors are working to resolve the remaining objection. The hearing is going forward.

*[Remainder of Page Intentionally Left Blank]*

Dated: October 30, 2023  
Wilmington, Delaware

<p><u>/s/ Morgan L. Patterson</u>  <b>WOMBLE BOND DICKINSON (US) LLP</b>  Donald J. Detweiler (DE Bar No. 3087)  Morgan L. Patterson (DE Bar No. 5388)  1313 North Market Street, Suite 1200  Wilmington, Delaware 19801  Telephone: (302) 252-4320  Facsimile: (302) 252-4330  don.detweiler@wbd-us.com  morgan.patterson@wbd-us.com</p> <p><i>Proposed Counsel to the Debtors and Debtors in Possession</i></p>	<p><b>WHITE &amp; CASE LLP</b>  Thomas E Lauria (admitted <i>pro hac vice</i>)  Matthew C. Brown (admitted <i>pro hac vice</i>)  Fan B. He (admitted <i>pro hac vice</i>)  200 South Biscayne Boulevard, Suite 4900  Miami, FL 33131  Telephone: (305) 371-2700  tlauria@whitecase.com  mbrown@whitecase.com  fhe@whitecase.com</p> <p>David M. Turetsky (admitted <i>pro hac vice</i>)  1221 Avenue of the Americas  New York, NY 10020  Telephone: (212) 819-8200  david.turetsky@whitecase.com</p> <p>Jason N. Zakia (admitted <i>pro hac vice</i>)  111 South Wacker Drive, Suite 5100  Chicago, IL 60606  Telephone: (312) 881-5400  jzakia@whitecase.com</p> <p>Roberto Kampfner (admitted <i>pro hac vice</i>)  Doah Kim (admitted <i>pro hac vice</i>)  RJ Szuba (admitted <i>pro hac vice</i>)  555 South Flower Street, Suite 2700  Los Angeles, CA 90071  Telephone: (213) 620-7700  rkampfner@whitecase.com  doah.kim@whitecase.com  rj.szuba@whitecase.com</p> <p><i>Counsel to Debtors and Debtors in Possession</i></p>
---	--